

## The Honorable John C. Coughenour

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

MYRIAM ZAYAS,

**Plaintiff,**

V.

ANNETTE MESSITT, JEFFREY  
WHITNEY, AMBER WHITNEY, et al.,

### Defendants.

NO. 2:20-cv-00747 JCC

## DECLARATION OF RACHEL LIGHTHILL

Rachel Lighthill hereby declares as follows:

1. I am over the age of 18 and am competent to testify about the matters stated herein.

I make this declaration based on my personal knowledge and the records in this case.

2. I am a Paralegal with the Washington State Attorney General's Office assigned to work with Assistant Attorney General David La Raus.

3. At the direction of AAG David La Raus, between September 15, 2020 and September 18, 2020, I uploaded the State's exhibits to the court's ShareFile in the case of *In Re Dependency of ACZ*, King County Superior Court Juvenile Division, Cause No. 20-7-00666-0 KNT. One of the files I uploaded during this time, was a copy of the audio file from the March 17, 2020 72-Hour Shelter Care Hearing that I obtained from Legal Assistant Janelle Serrao. I

did not do anything in an attempt to alter the substance of the file in any way prior to uploading it to the court's ShareFile site.

4. ***Exhibit 1*** to this declaration is a true and correct copy of my September 18, 2020 email to Judge Ramseyer wherein I notified the court that I had uploaded the State's exhibits.

5. ***Exhibit 2*** to this declaration is a true and correct copy of the Exhibit List attached to my September 18, 2020 email to Judge Ramseyer in Exhibit 1. Exhibit 114 on that Exhibit List is a copy of the audio file from the March 17, 2020 72-Hour Shelter Care Hearing.

6. ***Exhibit 3*** to this declaration is a true and correct copy the audio file that I uploaded to the court's ShareFile site between September 15, 2020 and September 18, 2020.

I declare under penalty of perjury of law under the laws of the State of Washington that the foregoing is true and correct.

EXECUTED in King County, Washington on this 12<sup>th</sup> day of July 2021.

Rachel Lighthill  
RACHEL LIGHTHILL

# EXHIBIT 1

**From:** [La Raus David W \(ATG\)](#)  
**To:** [Lenihan Brendan \(ATG\)](#)  
**Subject:** FW: Amiya Curnal-Zayas Dependency Trial 9-21-20  
**Date:** Wednesday, June 30, 2021 1:58:38 PM  
**Attachments:** [Exhibit List.doc](#)

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Paralegal's email to court indicating exhibits have been uploaded for use at trial.

David La Raus  
 Assistant Attorney General  
 Division of Social & Health Services, Seattle  
 800 5th Ave. Ste. #2000  
 Seattle, WA 98164  
 (206) 464-7470  
 fax (206) 464-6338

\*\*\*\*\*  
 NOTE: THIS EMAIL TRANSMISSION IS INTENDED ONLY FOR THE ADDRESSEE SHOWN ABOVE. IT MAY CONTAIN PRIVILEGED ATTORNEY-CLIENT COMMUNICATION OR ATTORNEY WORK PRODUCT, OR OTHER INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, OR OTHERWISE PROTECTED FROM DISCLOSURE. ANY REVIEW, DISSEMINATION, OR USE OF THIS TRANSMISSION OR ITS CONTENTS BY PERSONS OTHER THAN THE ADDRESSEE IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, PLEASE DESTROY AND NOTIFY SENDER IMMEDIATELY BY EMAIL OR TELEPHONE AT THE ABOVE NUMBER. THANK YOU.  
 \*\*\*\*\*

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**From:** Lighthill, Rachel T. (ATG)  
**Sent:** Friday, September 18, 2020 7:57 AM  
**To:** 'Court, Ramseyer' <Ramseyer.Court@kingcounty.gov>; La Raus, David W (ATG) <david.laraus@atg.wa.gov>; Cowan, Jennie <jcowan@kingcounty.gov>  
**Cc:** Magee, Jamaal (DCYF) <jamaal.magee@dcyf.wa.gov>; DeCamp, Julie (DCYF) <julie.decamp@dcyf.wa.gov>; Group, CASA <CASA.Group@kingcounty.gov>; Duke, Pauline <Pauline.Duke@kingcounty.gov>  
**Subject:** RE: Amiya Curnal-Zayas Dependency Trial 9-21-20

Hello Judge Ramseyer's Court:

Will this Zoom invite be the same invite we provide witnesses to testify at trial? Also, the state's exhibits (153 total) have been uploaded to ShareFile. Per Beth Freeman at court, she will move the exhibits into Judge Ramseyer's department folder and add the parties (listed below). She reported the clerk in then responsible for adding the parties to the folder:

CASA Attorney- Jennie Cowan [jcowan@kingcounty.gov](mailto:jcowan@kingcounty.gov)

CASA- Pauline Duke [Pauline.Duke@kingcounty.gov](mailto:Pauline.Duke@kingcounty.gov)

Pro Se Mother- Myriam Zayas [amiya.angel@gmail.com](mailto:amiya.angel@gmail.com)

SW Jamaal Magee [Jamaal.magee@dcyf.wa.gov](mailto:Jamaal.magee@dcyf.wa.gov)

SW Julie DeCamp [Julie.decamp@dcyf.wa.gov](mailto:Julie.decamp@dcyf.wa.gov)

AAG David La Raus [david.laraus@atg.wa.gov](mailto:david.laraus@atg.wa.gov)

Please find attached state's exhibit grid:

*Rachel Lighthill*

Paralegal to AAG David La Raus

Attorney General's Office  
 Social and Health Services Division  
 800 5th Ave. Ste. 2000

Seattle, Washington 98104  
(206) 464-7016

Fax: (206) 464-6338

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**From:** Court, Ramseyer <[Ramseyer.Court@kingcounty.gov](mailto:Ramseyer.Court@kingcounty.gov)>  
**Sent:** Friday, September 18, 2020 7:31 AM  
**To:** La Raus, David W (ATG) <[david.laraus@atg.wa.gov](mailto:david.laraus@atg.wa.gov)>; Cowan, Jennie <[jcowan@kingcounty.gov](mailto:jcowan@kingcounty.gov)>; Lighthill, Rachel T. (ATG) <[Rachel.Lighthill@atg.wa.gov](mailto:Rachel.Lighthill@atg.wa.gov)>  
**Cc:** Magee, Jamaal (DCYF) <[jamaal.magee@dcyf.wa.gov](mailto:jamaal.magee@dcyf.wa.gov)>; DeCamp, Julie (DCYF) <[julie.decamp@dcyf.wa.gov](mailto:julie.decamp@dcyf.wa.gov)>; Group, CASA <[CASA.Group@kingcounty.gov](mailto:CASA.Group@kingcounty.gov)>; Duke, Pauline <[Pauline.Duke@kingcounty.gov](mailto:Pauline.Duke@kingcounty.gov)>  
**Subject:** RE: Amiya Curnal-Zayas Dependency Trial 9-21-20

Fabulous! Hope you are feeling better. I'll send a Zoom invite shortly.

Thank you!

Warm regards,

Bren Smith

**Bailiff to Judge Judith H. Ramseyer**

**Phone:** 206-477-1605

**Email:** [ramseyer.court@kingcounty.gov](mailto:ramseyer.court@kingcounty.gov)

**From:** La Raus, David W (ATG) <[david.laraus@atg.wa.gov](mailto:david.laraus@atg.wa.gov)>  
**Sent:** Friday, September 18, 2020 7:27 AM  
**To:** Court, Ramseyer <[Ramseyer.Court@kingcounty.gov](mailto:Ramseyer.Court@kingcounty.gov)>; Cowan, Jennie <[jcowan@kingcounty.gov](mailto:jcowan@kingcounty.gov)>; Lighthill, Rachel T. (ATG) <[Rachel.Lighthill@atg.wa.gov](mailto:Rachel.Lighthill@atg.wa.gov)>  
**Cc:** Magee, Jamaal (DCYF) <[jamaal.magee@dcyf.wa.gov](mailto:jamaal.magee@dcyf.wa.gov)>; DeCamp, Julie (DCYF) <[julie.decamp@dcyf.wa.gov](mailto:julie.decamp@dcyf.wa.gov)>; Group, CASA <[CASA.Group@kingcounty.gov](mailto:CASA.Group@kingcounty.gov)>; Duke, Pauline <[Pauline.Duke@kingcounty.gov](mailto:Pauline.Duke@kingcounty.gov)>  
**Subject:** RE: Amiya Curnal-Zayas Dependency Trial 9-21-20

[EXTERNAL Email Notice!] External communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello – I am back at work and will file a trial brief today. I can participate in the status meeting at 9am on Monday.

Sincerely,

David La Raus  
Assistant Attorney General  
Division of Social & Health Services, Seattle  
800 5th Ave. Ste. #2000  
Seattle, WA 98164  
(206) 464-7470  
fax (206) 464-6338

OR OTHERWISE PROTECTED FROM DISCLOSURE. ANY REVIEW, DISSEMINATION, OR USE OF THIS TRANSMISSION OR ITS CONTENTS BY PERSONS OTHER THAN THE ADDRESSEE IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, PLEASE DESTROY AND NOTIFY SENDER IMMEDIATELY BY EMAIL OR TELEPHONE AT THE ABOVE NUMBER. THANK YOU.

\*\*\*\*\*

**From:** Court, Ramseyer <[Ramseyer.Court@kingcounty.gov](mailto:Ramseyer.Court@kingcounty.gov)>  
**Sent:** Thursday, September 17, 2020 5:17 PM  
**To:** Cowan, Jennie <[jcowan@kingcounty.gov](mailto:jcowan@kingcounty.gov)>; Lighthill, Rachel T. (ATG) <[Rachel.Lighthill@atg.wa.gov](mailto:Rachel.Lighthill@atg.wa.gov)>  
**Cc:** Magee, Jamaal (DCYF) <[jamaal.magee@dcyf.wa.gov](mailto:jamaal.magee@dcyf.wa.gov)>; DeCamp, Julie (DCYF) <[julie.decamp@dcyf.wa.gov](mailto:julie.decamp@dcyf.wa.gov)>; Group, CASA <[CASA.Group@kingcounty.gov](mailto:CASA.Group@kingcounty.gov)>; La Raus, David W (ATG) <[david.laraus@atg.wa.gov](mailto:david.laraus@atg.wa.gov)>; Duke, Pauline <[Pauline.Duke@kingcounty.gov](mailto:Pauline.Duke@kingcounty.gov)>  
**Subject:** RE: Amiya Curnal-Zayas Dependency Trial 9-21-20  
**Importance:** High

Counsel,

The Court is requesting that we start on Tuesday at 9:00 AM. In the meantime, if we could at least plan on professional parties discussing scheduling on Monday morning, or if need be, Monday at 3:00 PM, that would likely provide us all much clarity. If so, I'll set up a Zoom invite shortly.

Please let me know your preference for this discussion—Monday at 9:00 AM, or Monday at 3:00 PM?

Thank you!

Warm regards,

Bren Smith

**Bailiff to Judge Judith H. Ramseyer**

**Phone:** 206-477-1605

**Email:** [ramseyer.court@kingcounty.gov](mailto:ramseyer.court@kingcounty.gov)

**From:** Cowan, Jennie  
**Sent:** Thursday, September 17, 2020 3:14 PM  
**To:** Lighthill, Rachel T. (ATG) <[Rachel.Lighthill@atg.wa.gov](mailto:Rachel.Lighthill@atg.wa.gov)>; Court, Ramseyer <[Ramseyer.Court@kingcounty.gov](mailto:Ramseyer.Court@kingcounty.gov)>  
**Cc:** Magee, Jamaal (DCYF) <[jamaal.magee@dcyf.wa.gov](mailto:jamaal.magee@dcyf.wa.gov)>; DeCamp, Julie (DCYF) <[julie.decamp@dcyf.wa.gov](mailto:julie.decamp@dcyf.wa.gov)>; Group, CASA <[CASA.Group@kingcounty.gov](mailto:CASA.Group@kingcounty.gov)>; La Raus, David W (ATG) <[david.laraus@atg.wa.gov](mailto:david.laraus@atg.wa.gov)>; Duke, Pauline <[Pauline.Duke@kingcounty.gov](mailto:Pauline.Duke@kingcounty.gov)>  
**Subject:** Re: Amiya Curnal-Zayas Dependency Trial 9-21-20

Yes I would agree.

I have a lengthy motion on 9/22 at 8:30 am before Judge Wiggs-Martin and I was going to ask Judge Ramseyer to delay the start on 9/22 anyway. My client has an appointment on 9/22 in the morning but I was going to waive her presence.

Thank you

Jennie Cowan

GAL Attorney

**From:** Lighthill, Rachel T. (ATG) <[Rachel.Lighthill@atg.wa.gov](mailto:Rachel.Lighthill@atg.wa.gov)>

**Sent:** Thursday, September 17, 2020 2:07 PM

**To:** Court, Ramseyer <[Ramseyer.Court@kingcounty.gov](mailto:Ramseyer.Court@kingcounty.gov)>

**Cc:** Magee, Jamaal (DCYF) <[jamaal.magee@dcyf.wa.gov](mailto:jamaal.magee@dcyf.wa.gov)>; DeCamp, Julie (DCYF) <[julie.decamp@dcyf.wa.gov](mailto:julie.decamp@dcyf.wa.gov)>; Group, CASA <[CASA.Group@kingcounty.gov](mailto:CASA.Group@kingcounty.gov)>; Cowan, Jennie <[jcowan@kingcounty.gov](mailto:jcowan@kingcounty.gov)>; La Raus, David W (ATG) <[david.laraus@atg.wa.gov](mailto:david.laraus@atg.wa.gov)>

**Subject:** Amiya Curnal-Zayas Dependency Trial 9-21-20

[EXTERNAL Email Notice! ] External communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello Judge Ramseyer's Court:

We've been notified the Amiya Curnal-Zayas (20-7-00666-0 KNT) dependency trial is before your court on **Monday, September 21, 2020**. I just got off the phone with AAG David La Raus. He's been out sick the last two days and is concerned he won't be prepared to start trial on Monday. Would the court and parties be willing to push the start date to Tuesday (September 22<sup>nd</sup>) or Wednesday (September 23<sup>rd</sup>) instead? Please let us know.

Thank you!

*Rachel Lighthill*

Paralegal to AAG David La Raus

Attorney General's Office  
Social and Health Services Division  
800 5th Ave. Ste. 2000  
Seattle, Washington 98104  
(206) 464-7016

Fax: (206) 464-6338

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# EXHIBIT 2

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## LIST OF EXHIBITS

(EXLST)

CAUSE NO. 20-7-00666-0 KNT

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CAPTION:

In Re Dependency of:

Amiya Curnal-Zayas  
dob: 07-06-14

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LEGEND:	CODES:
<p>Π= Plaintiff/Petitioner Δ= Defendant/Respondent A = Admitted AN = Admitted but not to go to jury R = Refused Re-O&amp;A = Re-offered and Admitted ID = For Identification Only Ret = Returned</p>	

**Exhibit List, Page 2 of 15****Cause No.** 20-7-00666-0 KNTCaption: In Re the Dependency of: Amiya Curnal-Zayas, dob: 07-06-14

No.	Π	Δ	Description	A AN R	Date	Re-O & A	I D	R e t
1			Agreed Order of Dependency and Agreed Dispositional Plan as to Mother, Myriam Zayas (Marcel Bradley-Zayas 09-7-01466-7/Jasmine Zayas 09-7-01465-9), filed 02-01-10					
2			First Dependency Review Hearing Order as to Mother (Marcel Bradley-Zayas 09-7-01466-7), filed 02-24-10					
3			Permanency Planning Hearing Order (Marcel Bradley-Zayas 09-7-01466-7), filed 08-17-10					
4			Dependency Review Hearing Order (Marcel Bradley-Zayas 09-7-01466-7), filed 10-06-10					
5			Dependency Review Hearing Order (Marcel Bradley-Zayas 09-7-01466-7), filed 03-07-11					
6			Permanency Planning Hearing Order (Marcel Bradley-Zayas 09-7-01466-7), filed 06-20-11					
7			Dependency Review Hearing Order (Marcel Bradley-Zayas 09-7-01466-7), filed 11-28-11					
8			Motion and Order Dismissing Petition for Termination of Parent-Child Relationship (Marcel Bradley-Zayas 11-7-00424-8), filed 02-08-12					
9			Email Correspondence Between Mother and Pierce County Superior Court (Marcel Bradley-Zayas 09-7-01466-7), filed 03-07-12					
10			Email Correspondence Between Mother and Pierce County Superior Court (Marcel Bradley-Zayas 09-7-01466-7), filed 03-08-12					
11			Letter from Mother filed with Pierce County Superior Court (Marcel Bradley-Zayas 09-7-01466-7/Jasmine Zayas 09-7-01465-9), filed 03-14-12					

**Exhibit List, Page 3 of 15****Cause No.** 20-7-00666-0 KNTCaption: In Re the Dependency of: Amiya Curnal-Zayas, dob: 07-06-14

No.	Π	Δ	Description	A AN R	Date	Re-O & A	I D	R e t
12			Email Correspondence Between Mother and Pierce County Superior Court (Marcel Bradley-Zayas 09-7-01466-7), filed 03-15-12					
13			Permanency Planning Hearing Order (Marcel Bradley-Zayas 09-7-01466-7), filed 05-18-12					
14			Letter from Mother filed with Pierce County Superior Court (Marcel Bradley-Zayas 09-7-01466-7), filed 05-24-12					
15			Order Amending Placement to Relative Care and Mother's Email Response (Marcel Bradley-Zayas 09-7-01466-7/Jasmine Zayas 09-7-01465-9), filed 08-08-12					
16			Dependency Review Hearing Order (Marcel Bradley-Zayas 09-7-01466-7), filed 10-26-12					
17			Email from Mother filed with Pierce County Superior Court (Marcel Bradley-Zayas 09-7-01466-7), filed 10-31-12					
18			Permanency Planning Hearing Order (Marcel Bradley-Zayas 09-7-01466-7), filed 12-07-12					
19			Dependency Review Hearing Order (Marcel Bradley-Zayas 09-7-01466-7), filed 03-04-13					
20			Permanency Planning Hearing Order (Marcel Bradley-Zayas 09-7-01466-7), filed 08-19-13					
21			Permanency Planning Hearing Order (Marcel Bradley-Zayas 09-7-01466-7), filed 02-24-14					
22			Petition for Termination of Parent-Child Relationship (Marcel Bradley-Zayas 14-7-00897-3), filed 04-21-14					

**Exhibit List, Page 4 of 15****Cause No.** 20-7-00666-0 KNTCaption: In Re the Dependency of: Amiya Curnal-Zayas, dob: 07-06-14

No.	Π	Δ	Description	A AN R	Date	Re-O & A	I D	R e t
23			Dependency Review Hearing Order (Marcel Bradley-Zayas 09-7-01466-7), filed 07-14-14					
24			Permanency Planning Hearing Order (Marcel Bradley-Zayas 09-7-01466-7), filed 12-15-14					
25			Dependency Review Hearing Order (Marcel Bradley-Zayas 09-7-01466-7), filed 05-11-15					
26			Order Dismissing Dependency (Marcel Bradley-Zayas 09-7-01466-7), filed 08-20-15					
27			Motion and Order Dismissing Petition for Termination of Parent-Child Relationship (Marcel Bradley-Zayas 14-7-00897-3), filed 08-20-15					
28			Agreed Order of Dependency as to the Mother, Myriam Zayas (Jasmine Zayas 13-7-12094-0 SEA), filed 03-14-14					
29			First Dependency Review Hearing Order as to Mother (Jasmine Zayas 13-7-12094-0 SEA), filed 05-07-14					
30			Permanency Planning Hearing Order (Jasmine Zayas 13-7-12094-0 SEA), filed 06-11-14					
31			Dependency Review Hearing Order (Jasmine Zayas 13-7-12094-0 SEA), filed 12-04-14					
32			Relinquishment of Custody, Consent to Termination/Adoption, and Waiver of Right to Receive Notice of Proceedings (Jasmine Zayas 15-7-00270-6 SEA), filed 01-22-15					

**Exhibit List, Page 5 of 15****Cause No.** 20-7-00666-0 KNTCaption: In Re the Dependency of: Amiya Curnal-Zayas, dob: 07-06-14

No.	Π	Δ	Description	A AN R	Date	Re-O & A	I D	R e t
33			Findings of Fact, Conclusions of Law and Order Terminating the Parent-Child Relationship as to the Parent (Jasmine Zayas 15-7-00270-6 SEA), filed 01-22-15					
34			Permanency Planning Hearing Order-Legally Free Child (Jasmine Zayas 13-7-12094-0 SEA), filed 05-27-15					
35			Permanency Planning Hearing Order-Legally Free Child (Jasmine Zayas 13-7-12094-0 SEA), filed 11-09-15					
36			Agreed Order Dismissing Dependency (Jasmine Zayas 13-7-12094-0 SEA), filed 02-24-16					
37			Agreed 72Hour Shelter Care Hearing Order (Baby Girl Zayas 14-7-01695-4 SEA); filed 07-10-14					
38			Agreed Order of Dependency as to Mother (Baby Girl Zayas aka Amiya Angel Diane Curnal-Zayas 14-7-01695-4 SEA), dated 11-19-14					
39			Order Dismissing Dependency as to Alleged Father, Jermaine Deshawn Curnal (Amiya Angel Diane Curnal-Zayas 14-7-01695-4 SEA), filed 01-08-15					
40			First Dependency Review Hearing Order (Amiya Curnal-Zayas 14-7-01695-4 SEA), filed 01-21-15					
41			Default Order of Dependency as to Unknown Father and/or Anyone Else Claiming a Parental Interest (Baby Girl Zayas aka Amiya Angel Diane Curnal-Zayas 14-7-01695-4 SEA), filed 04-15-15					

**Exhibit List, Page 6 of 15****Cause No.** 20-7-00666-0 KNTCaption: In Re the Dependency of: Amiya Curnal-Zayas, dob: 07-06-14

No.	Π	Δ	Description	A AN R	Date	Re-O & A	I D	R e t
42			Order of Default as to Unknown Father and/or Anyone Else Claiming a Paternal Interest (Amiya Angel Diane Curnal-Zayas 14-7-01695-4 SEA), filed 04-15-15					
43			Permanency Planning Hearing Order (Amiya Curnal-Zayas 14-7-01695-4 SEA), filed 07-15-15					
44			Mother's Declaration (Amiya Curnal-Zayas 14-7-01695-4 SEA), filed 10-28-15					
45			Mother's Second Declaration (Amiya Curnal-Zayas 14-7-01695-4 SEA), filed 10-28-15					
46			Order Dismissing Dependency (Amiya Curnal-Zayas 14-7-01695-4 SEA), filed 10-28-15					
47			Contested 72Hour Shelter Care Hearing Order (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 03-17-20					
48			Objections and Corrections to the Report of the Child Welfare Caseworker filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 04-06-20					
49			Amend Placement and Return Home filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 04-06-20					
50			Motion for Child to Return Home and Safety Plan Agreement filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 04-06-20					
51			Email Correspondence Dated 04-07-20 from Mother filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 04-09-20					

**Exhibit List, Page 7 of 15****Cause No.** 20-7-00666-0 KNTCaption: In Re the Dependency of: Amiya Curnal-Zayas, dob: 07-06-14

No.	Π	Δ	Description	A AN R	Date	Re-O & A	I D	R e t
52			Email Correspondence Dated 04-08-20 from Mother filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 04-09-20					
53			Email Correspondence Dated 04-06-20 from Mother filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 04-09-20					
54			Email Correspondence Dated 04-06-20 from Mother filed by Mother (2) (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 04-09-20					
55			Email Correspondence Dated 04-03-20 from Mother filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 04-09-20					
56			Email Correspondence Dated 04-02-20 from Mother filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 04-09-20					
57			Email Correspondence Dated 04-01-20 from Mother filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 04-09-20					
58			Email Correspondence Dated 04-09-20 from Mother filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 04-14-20					
59			Order on Request for Emergency Motion for Withdrawal (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 05-04-20					
60			Motion and Declaration for Change of Judge filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 05-05-20					
61			Declaration of Facts and Request to End Corruption filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 05-18-20					
62			Order Continuing Fact-Finding/Trial (Amiya Curnal-Zayas 20-7-00066-0 KNT), filed 05-18-20					

**Exhibit List, Page 8 of 15****Cause No.** 20-7-00666-0 KNTCaption: In Re the Dependency of: Amiya Curnal-Zayas, dob: 07-06-14

No.	Π	Δ	Description	A AN R	Date	Re-O & A	I D	R e t
63			Order Granting Mother's Counsel's Request to Withdraw, Appointing New Counsel, and Setting a Hearing to Determine if a Litigation Guardian ad Litem Should Be Appointed (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 05-19-20					
64			Public Law Printout filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 05-26-20					
65			Public Law Printout filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 05-26-20					
66			Right to be Heard "I Can't Speak" filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 06-01-20					
67			Pages from Child Welfare Policy Manual filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 06-04-20					
68			Statement of Mother filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 06-08-20					
69			Order on Hearing to Address Need for GAL for Mother/Mother's Request to Proceed Pro Se (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 06-12-20					
70			Motion and Declaration for Order Dismissing Attempted Dependency (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 06-26-20					
71			Email Communication filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 07-02-20					
72			Order Continuing Fact-Finding/Trial (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 07-06-20					
73			Statement of Mother filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 07-08-20					
74			Declaration of In Person Visits filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 07-08-20					

**Exhibit List, Page 9 of 15****Cause No.** 20-7-00666-0 KNTCaption: In Re the Dependency of: Amiya Curnal-Zayas, dob: 07-06-14

No.	Π	Δ	Description	A AN R	Date	Re-O & A	I D	R e t
75			Email Correspondence Between Mother and Social Treatment Opportunity Programs (STOP) Regarding Sober Support Meetings dated 04-09-20 to 05-21-20 filed by Mother, filed 07-09-20					
76			Social Treatment Opportunity Programs (STOP) Treatment Compliance Report filed by Mother dated 05-03-20; filed 07-09-20					
77			Medical Message from Dr. Jacob Christ of UW Medicine to Mother filed by Mother dated 03-18-20, filed 07-09-20					
78			Declaration of Mother filed by Mother, filed 07-13-20					
79			Proposed Order to Modify Visitation filed by Mother, filed 07-13-20					
80			Motion for Order to Release the Child filed by Mother, filed 07-13-20					
81			Sealed Confidential Report- Declaration of Mother filed by Mother, filed 08-03-20					
82			Sealed Confidential Report- Declaration of Mother filed by Mother, filed 08-04-20					
83			Certified Copy of Summons: Notice about Changing a Parenting Plan, Residential Schedule or Custody Order (King County Superior Court 18-3-73972-5 KNT), filed 11-28-18					
84			Certified Copy of Order of Dismissal (King County Superior Court 18-3-73972-5 KNT), filed 06-17-19					
85			Certified Copy of Petition for Parenting Plan, Residential Schedule and/or Child Support (King County Superior Court 18-3-04468-9 KNT), filed 07-25-18					
86			Certified Copy of Order of Dismissal (King County Superior Court 18-3-04468-9 KNT), filed 03-05-19					

**Exhibit List, Page 10 of 15****Cause No.** 20-7-00666-0 KNTCaption: In Re the Dependency of: Amiya Curnal-Zayas, dob: 07-06-14

No.	Π	Δ	Description	A AN R	Date	Re-O & A	I D	R e t
87			Certified Copy of Summons: Notice about Changing a Parenting Plan, Residential Schedule or Custody Order (King County Superior Court 17-3-06373-1 KNT), filed 10-19-17					
88			Certified Copy of Order of Dismissal (King County Superior Court 17-3-06373-1 KNT), filed 05-22-18					
89			Certified Copy of Final Parenting Plan (Pierce County Superior Court 15-3-01569-8), filed 08-20-15					
90			Certified Copy of Complaint for Violation of Civil Rights filed by Mother (US District Court-Western District of Washington 2:20-cv-00650), filed 04-29-20					
91			Certified Copy of Amended Complaint for Violation of Civil Rights filed by Mother (US District Court-Western District of Washington 2:20-cv-00650), filed 05-06-20					
92			Certified Copy of Mother's Motion to Amend Deadline for Initial Disclosures (US District Court-Western District of Washington 2:20-cv-00650), filed 05-18-20					
93			Certified Copy of Order Denying Mother's Motion to Amend Initial Disclosure Deadline, Waive In-Person Service, File Document Under Seal and Requesting Production of Documents (US District Court-Western District of Washington 2:20-cv-00650), filed 06-12-20					
94			Certified Copy of Joint Status Report and Discovery Plan (US District Court-Western District of Washington 2:20-cv-00650), filed 07-23-20					
95			Certified Copy of Joint Status Report and Discovery Plan (US District Court-Western District of Washington 2:20-cv-00650), filed 07-23-20					

**Exhibit List, Page 11 of 15****Cause No.** 20-7-00666-0 KNTCaption: In Re the Dependency of: Amiya Curnal-Zayas, dob: 07-06-14

No.	Π	Δ	Description	A AN R	Date	Re-O & A	I D	R e t
96			Certified Copy of Complaint filed by Mother (US District Court-Western District of Washington 20-CV-00747), filed 06-16-20					
97			Certified Copy of Amended Complaint filed by Mother (US District Court-Western District of Washington 20-CV-00747), filed 06-30-20					
98			Certified Copy of Complaint filed by Mother (US District Court-Western District of Washington 20-CV-981), filed 06-18-20					
99			Certified Copy of Amended Complaint filed by Mother (US District Court-Western District of Washington 20-CV-981), filed 07-03-20					
100			Certified Copy of Complaint filed by Mother (US District Court-Western District Court of Washington 20-CV-1001), filed 07-02-20					
101			Neuropsychological Assessment as to Mother Completed by Paul Connor, Ph.D., dated 04-03-15					
102			Cordant Health Solutions Positive-Altered Urinalysis Test as to Mother, collected 03-05-20 (A); 04-23-20 (B); 05-13-20 (C)					
103			Chemical Dependency Evaluation Social Summary as to Mother Completed by Social Treatment Opportunity Programs (STOP), dated 04-01-20					
104			Treatment Compliance Report from Social Treatment Opportunity Programs (STOP) as to Mother, dated 05-03-20					
105			Email Correspondence Between AGO and Mother, dated 05-19-20 to 05-20-20					
106			Email Correspondence Between AGO and Mother, dated 06-17-20 to 06-24-20					

**Exhibit List, Page 12 of 15****Cause No.** 20-7-00666-0 KNTCaption: In Re the Dependency of: Amiya Curnal-Zayas, dob: 07-06-14

No.	Π	Δ	Description	A AN R	Date	Re-O & A	I D	R e t
107			Email Correspondence Between AGO and Mother, dated 06-24-20 to 06-25-20					
108			Email Correspondence Between Mother and Department, dated 06-24-20 to 06-25-20					
109			Email Correspondence Between Mother, AGO and Department, dated 06-30-20 to 07-02-20					
110			Text Message Correspondence Between Department and Mother, dated 05-14-20 to 07-06-20					
111			Emails from Mother to AGO, dated 07-12-20 to 07-13-20					
112			Email from Mother to AGO and Department, dated 07-14-20					
113			King County Superior Court Clerk's Minutes (Amiya Curnal-Zayas 20-7-00666-0 KNT), dated 03-17-20					
114			72 Hour Shelter Care Hearing Audio Recording (8 segments), dated 03-17-20					
115			Sealed Confidential Report and Memorandum-Documents filed by Mother, dated 08-13-20					
116			Sealed Confidential Report and Miscellaneous Documents filed by Mother, dated 08-13-20					
117			Motion and Order for Plaintiff to Provide the Required SW License Number filed by Mother, dated 08-14-20					
118			Sibling Visitation Document filed by Mother, dated 08-14-20					
119			Photos of a Family and UA Tests filed by Mother, dated 08-17-20					
120			Email Correspondence Between Department and Mother-Service Letter, dated 08-12-20					
121			Letter from Social Treatment Opportunity Programs (STOP) Regarding Mother's Discharge, dated 05-21-20					

**Exhibit List, Page 13 of 15****Cause No.** 20-7-00666-0 KNTCaption: In Re the Dependency of: Amiya Curnal-Zayas, dob: 07-06-14

No.	Π	Δ	Description	A AN R	Date	Re-O & A	I D	R e t
122			Email Correspondence from Mother to AGO with Attached Protection Order Documents, dated 08-20-20					
123			Certified Copy of Petition for an Order for Protection filed Against Mother (King County District Court 205-01474), filed 8-17-20					
124			Certified Copy of Temporary Protection Order and Notice of Hearing-Harassment (King County District Court 205-01474), filed 08-18-20					
125			Certified Copy of Temporary Protection Order (2) and Notice of Hearing-Harassment (King County District Court 205-01474), filed 08-18-20					
126			University of Washington Social Worker Note as to Mother, dated 02-08-20					
127			University of Washington Social Worker Note as to Mother, dated 02-12-20					
128			University of Washington Discharge Summary as to Mother, dated 02-12-20					
129			University of Washington Lab Tests from February-March 2020					
130			University of Washington Medical Note of Correspondence with Mother, dated 03-24-20					
131			University of Washington Encounter-Emails Between Mother and Hospital, March 2020					
132			University of Washington Medical Note Regarding Mother, dated 04-01-20					
133			University of Washington Encounter-Emails Between Mother and Hospital, April 2020					

**Exhibit List, Page 14 of 15****Cause No.** 20-7-00666-0 KNTCaption: In Re the Dependency of: Amiya Curnal-Zayas, dob: 07-06-14

No.	Π	Δ	Description	A AN R	Date	Re-O & A	I D	R e t
134			University of Washington Mental Health Intake Assessment as to Mother, dated 05-12-20					
135			Text Message Correspondence Between Department and Mother, dated 02-19-20 to 04-02-20					
136			Email Correspondence Between Department and Mother, dated 06-22-20					
137			Email Correspondence Between Department and Mother, dated 06-25-20					
138			Email Correspondence from Mother to Department, dated 07-04-20					
139			Email Correspondence Between Department and Mother, dated 07-02-20					
140			Visitation No Show Report as to Mother, dated 06-25-20					
141			Visitation Reports as to Mother and Child, dated 05-18-20 (A); 07-01-20 (B)					
142			Declaration of Mother filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), dated 07-13-20					
143			Response of Mother filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), dated 08-18-20					
144			Response of Mother filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), dated 08-21-20					
145			Email from Mother to Judge Messitt filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 08-24-20					
146			Email from Mother to Judge Messitt (2)filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 08-24-20					

**Exhibit List, Page 15 of 15****Cause No.** 20-7-00666-0 KNTCaption: In Re the Dependency of: Amiya Curnal-Zayas, dob: 07-06-14

No.	Π	Δ	Description	A AN R	Date	Re-O & A	I D	R e t
147			Default Order of Dependency as to Unknown Father and/or Anyone Else Claiming a Parental Interest (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 08-25-20					
148			Order of Default as to Unknown Father and/or Anyone Else Claiming a Parental Interest (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 08-25-20					
149			MultiCare Auburn Medical Center Social Worker Mental Health Assessment as to Mother, dated 02-21-20					
150			MultiCare Auburn Medical Center Discharge Summary as to Mother, dated 02-22-20					
151			Declaration of Mother filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 09-02-20					
152			Declaration of Mother filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 09-03-20					
153			Declaration of Mother filed by Mother (Amiya Curnal-Zayas 20-7-00666-0 KNT), filed 09-08-20					

# EXHIBIT 3

The Honorable John C. Coughenour

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

MYRIAM ZAYAS,

Plaintiff,

v.

ANNETTE MESSITT, JEFFREY  
WHITNEY, AMBER WHITNEY

Defendants.

NO. 2:20-cv-00747 JCC

NOTICE OF PHYSICAL FILING

**The attached thumb drive contains an audio file, which should be inserted here.**